

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Latashia Chinita Parrott, Debtor

**Case No. 23-01983-JAW
CHAPTER 13**

MOTION TO INCUR NEW DEBT

COMES NOW, Debtor, by and through counsel, and moves this Court to allow Debtor to incur new debt, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on 08/30/2023.
2. Debtor is paying approximately 100% to General Unsecured Debts through the plan.
3. Debtor does not currently own a vehicle and has been relying on her mother's vehicle to commute to and from work. She is no longer able to use her mother's vehicle and needs to obtain her own.
4. A Supplemental Schedule I and J (Dk #85) has been filed evidencing debtor's current income and expenses and demonstrating her ability to make the proposed direct payments for the vehicle loan.
5. Debtor wishes to borrow up to \$30,000.00 to purchase a vehicle with an interest rate not to exceed 20.00% and monthly payments not to exceed \$450.00. Debtor will make payments directly to the lender in accordance with the terms of the loan agreement.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)
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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the foregoing was forwarded on July 18, 2025, to the creditor, case trustee and U.S. Trustee as indicated in the "21-day notice" that accompanies this Motion.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.